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April 10, 2025

*Via ECF*

Honorable Jessica G. L. Clarke  
United States District Judge  
Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

**MEMO ENDORSED**

Re: *Gregory Smith v. New Rochelle Police Department et al.* 24-CV-09899 (JGLC)(JCM)

Dear Judge Clarke,

As the Court is aware, the undersigned and The Quinn Law Firm represent the City of Mount Vernon Defendants in the above-referenced matter. We write on behalf of all Defendants to respectfully request an adjournment of the initial pretrial conference scheduled for April 17, 2025.

Plaintiff's deadline to amend his first amended complaint is May 1, 2025. Additionally, all Defendants have filed dispositive motions to dismiss the first amended complaint. Defendants have twenty-one (21) days from the filing of the second amended complaint to answer, file new motions to dismiss, or rely on their original motions to dismiss pursuant to Rule 4(e) of the Court's Individual Rules and Practices. Accordingly, Defendants respectfully submit that an initial pretrial conference and entry of a case management plan and scheduling order would be premature at this time, and respectfully request that the initial pretrial conference be adjourned to a date after all Defendants have either answered the second amended complaint or moved to dismiss it.

This is the first request by Defendants to adjourn the initial pretrial conference. Plaintiff consents to this request. The parties have conferred and propose May 29, June 4, and June 5 as alternative dates.

We thank the Court for its time and consideration of the instant request.

Application GRANTED. The initial pre-trial conference currently scheduled for April 17, 2025 is HEREBY RESCHEDULED to **May 29, 2025 at 11:00 AM**. The Microsoft Teams information and access credentials will remain unchanged. In addition, the parties shall submit the required joint letter and proposed stipulation and case management plan (see ECF No. 7 ) by **May 22, 2025**. The Clerk of Court is respectfully directed to terminate ECF No. 36.

Respectfully submitted,

The Quinn Law Firm PLLC

A handwritten signature in black ink, appearing to read "S. Bushnell", written over a horizontal line.

Steven J. Bushnell

Dated: April 14, 2025  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Jessica Clarke", written over a horizontal line.

JESSICA G. L. CLARKE  
United States District Judge

CC: *All parties via ECF*